

about the Adhesives RACT

SBCA-ADR-0700

The purpose of this summary is to help you understand how a RACT (Reasonably Available Control Technology) regulation for industrial adhesives may affect your business. This RACT regulation was created as a result of the Clean Air Act Amendments of 1990, mandating states with ozone problems to reduce volatile organic compound (VOC) emissions, which are a primary cause of ozone. The location of your business, the size of your operation and the types of chemicals you use will determine how this law affects you. Smaller businesses that have never been regulated before may need to comply with this rule. The actual regulation can be found in section NR 422.127 of the Wisconsin Administrative Code (Wis. Adm. Code).

Does This Wisconsin Regulation Affect My Business?

This standard applies to businesses in the ozone nonattainment area, which includes the counties of Kenosha, Kewaunee, Manitowoc, Milwaukee, Ozaukee, Racine, Sheboygan, Washington and Waukesha.

It applies to the use of adhesives or adhesive primers in the production of:

- Wood Furniture
- Office Partitions
- Wood Entry or Passage Doors



It does not apply to the use of adhesives or adhesive primers in furniture metal coating lines (reference section NR 422.10, Wis. Adm. Code), or in miscellaneous metal parts and products coating lines (reference section NR 422.15, Wis. Adm. Code).

Are There Any Exemptions to this Regulation?

The following facilities are exempt from the emission limitations of this section:

- ⇒ A facility that has total emissions of VOCs from the use of adhesives and adhesive primers of less than 50 pounds per month when averaged over any 12 consecutive months, in the productions listed above.
- ⇒ An emissions unit (defined as any individual applicator) that never applies
- ⇒ More than 16 ounces (one pint) of adhesives in a day.

EVEN IF YOUR FACILITY IS EXEMPT, YOU MUST COMPLY WITH THE RECORD KEEPING REQUIREMENTS FOR EXEMPT FACILITIES.

How Does My Business Comply With This Regulation?

This regulation requires you to comply with one of two emission limits for any adhesive or adhesive primer you use.

The two limits are:

- ✓ Use an adhesive/adhesive primer that has a solids content greater than or equal to 23 percent by weight, as applied; or
- ✓ Use an adhesive or adhesive primer that emits no more than 0.54 kilogram

per liter (4.5 pounds per gallon) of adhesive or adhesive primer, excluding water, delivered to an adhesive or adhesive primer applicator.

Record Keeping for Exempt Facilities

A facility that has total emissions of VOCs from the use of adhesives and adhesive primers of less than 50 pounds per month when averaged over any 12 consecutive months is required to collect and record the following information to support the exemption:

- ✕ A unique name or identification number for each adhesive and adhesive primer you use;
- ✕ The VOC content of each adhesive and adhesive primer, as applied, in units of pounds per gallon, excluding water;
- ✕ The volume of each adhesive and adhesive primer used per month, as applied, in units of gallons, excluding water; and
- ✕ The total VOC emissions from adhesives and adhesive primers used in units of pounds per month.



If your business claims an exemption from an emissions unit, such as a spray booth, that never applies more than one pint of adhesives in a day, you are required to collect and record the daily volume of adhesives applied for that unit and any other unit claimed as exempt. These records should be maintained for five years.

Record Keeping for Non-Exempt Facilities

Record keeping must start by July 1, 1996. Records should be kept on hand for five years. You are required to collect and record the following information, as applicable:

- ✕ A unique name or identification number for each adhesive and adhesive primer you use;
- ✕ The VOC content of each adhesive and adhesive primer, as applied, in units of pounds per gallon, excluding water;
- ✕ The percent solids by weight in each adhesive or adhesive primer, as applied.

The information required can easily be obtained from invoices, material safety data sheets (MSDS), or your adhesive suppliers. Additional information may be required under s. NR 439.04, Wis. Adm. Code. All records must be maintained for five years.

Prevention

The Industrial Adhesives RACT is designed to reduce the amount of pollution generated by facilities using industrial adhesives. While a single facility may not be a major cause of pollution, all the facilities using industrial adhesives, when taken together, represent a significant source of volatile organic emissions.

Limiting the amount of VOCs in the various adhesives used will help reduce pollution. Using more efficient application and clean-up equipment will also help to lower emissions released into the air. A common misconception exists that waste reduction efforts are costly and provide little economic value to a business. In reality, such efforts can increase competitiveness, simplify compliance with environmental regulations, decrease waste disposal costs, decrease liability, and improve worker health and safety.

ADDITIONAL EFFORTS TO REDUCE WASTE AND INCREASE PROFITS COULD INCLUDE:

- ☐ Working with your suppliers to explore alternative products and equipment. For a list of low VOC adhesive manufacturers and vendors, contact the University of Wisconsin-Extension's Solid and Hazardous Waste Education Center in Milwaukee at 414/227-3160.
- ☐ Training your operators on efficient application techniques. This will maximize the performance of your operators and your equipment.
- ☐ Keeping adhesives and other VOC containing materials in closed containers. This will reduce evaporation and protect the health and safety of your workers.

- ☐ Minimizing the amount of off-spec adhesives to reduce the amount of waste generated.
- ☐ Controlling your inventory and rotating your stock. Some adhesives may have a limited shelf life. Check with your supplier for expiration dates.
- ☐ Considering a free and confidential assessment of your operations? Contact the University of Wisconsin-Extension, Milwaukee at 414/227-3160.



Contacts for More Information or Assistance.

The Small Business Clean Air Assistance Program helps smaller businesses understand and comply with the Clean Air Act regulations. Contact one of the program's Clean Air Specialists for more assistance: Renée Lesjak Bashel at 608/264-6153 or Tom Coogan at 608/267-9214.

For further information on the Adhesive RACT rule contact your DNR Regional or Service Center office shown on the **DNR Contact Fact Sheet** or the DNR's Central office at 608/266-2856.